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Application Number	09/761604
Filing Date	1/16/2001
First Named Inventor	Caldwell
Art Unit	2172
Examiner Name	Alford W. Kindred
Attorney Docket Number	CO2-2

Total Number of Pages in This Submission

7

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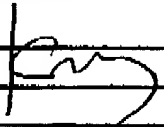
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SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

July 25, 2004

In re Application of	Caldwell et al.
Serial Number	09/761,604
Filed	1/16/2001
For	Natural Language Product Comparison Guide Synthesizer
Examiner	Kindred, Alford W
Art Unit	2172
Confirmation Number	5820
Attorney Docket Number	CO2-2

Honorable Commissioner for Patents
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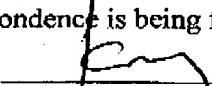
REQUEST FOR RECONSIDERATION

This paper is filed in response to the Office Action of May 25, 2004, which has been reviewed and its contents carefully considered. The Applicants request reconsideration of this case. Claims 1, 3, 5 through 11, 13, and 14 remain in this case. No Amendments are made by this response.

Preliminary Comments

As per Amendment B, filed on 3/15/2004, only Claims 1, 3, 5 through 11, 13, and 14 remain in this case. Claim 12 was cancelled by said Amendment. While Claim 12 is mentioned in the Office Action of May 25, 2004, it is a cancelled claim and will not be discussed in the present Request for Reconsideration.

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Rejections under 35 USC § 103

Claims 1, 3, 5 through 11, 13, and 14 were rejected under 35 USC 103 (a) as being unpatentable over Tavor, US # 2001/0032077A1 in view of Dicker et al., US 2003/0105682A1.

In making the rejection, the Examiner stated: "As per claims 1, 3, and 13-14, Tavor teaches 'developing feature text snippets for each feature, the snippets being phrases to be used when describing ... product features' (see abstract) 'dynamically generated fluent text that is used to convey product analyses...' (see page 4, paragraphs [0051] - [0054]) 'developing user profile text snippets ... generic phrases ...' (see page 4, Paragraphs [0049] - [0052])."

Applicants respectfully disagree. The Tavor reference is a program which uses natural language to directly compare two products which are selected from a group of products. Standard texts and relative statements are combined into sentences which compare selected products in a form such as, "bigger than..." or "rather sweet", or "a bit sweeter than..." (Paragraph [0021]). The Tavor specification is strictly described in terms of an algorithm to return a textual comparison between specified products based on a relation between the products. Further, Tavor neither uses nor suggests the use of user profiles or user text snippets, nor does Tavor provide recommendations of a product using these snippets and generic text to produce a personalized recommendation for a product. There is nothing in "cmp_data(Topic, Value, ProductName)" which has any relation to specific users or their preferences or profiles. Applicants respectfully point out that the current claims do not have the "comparison guide" language.

The cited paragraphs in Tavor (Paragraphs [0049] - [0054]) do not describe or suggest the use or existence of user profile text snippets; dynamically generated fluent text that is used to convey product analyses; or developing user profile text snippets. Paragraph [0049] just describes replacing variables and constructing strings in the abstract. Paragraph [0050] indicates that the data passed to the routine "Update_Compare_Text" is a string processed by the routine described in the last paragraph, a list of products, and a string representing the type of information in the previous string ("similar products", "additional info for products", etc.). Paragraph [0051] describes how strings are strung together to form a unified sentence (i.e. if the string "p1 is bigger than p2" is added to an existing string "p1 and p2 are big", the result

is "Although both p1 and p2 are big, p1 is bigger than p2"). Paragraph [0052] names the main procedure of the program, and indicates that it calls the other processes described earlier. Paragraph [0053] states that for the comparison technique proposed by Tavor, certain data fragments will not appear in the output as a function of relational compare vs. the standard comparison technique. Finally, Paragraph [0054] describes the assembly of the textual output of the program. It uses similar product information and the topic-value pairs to prepare a textual comparison between specified products based on a relation between the products. However Tavor is not generating dynamic fluent text output with recommendations based on user profiles. Generation of dynamic fluent text output is not described or claimed in Paragraph [0054] or anywhere else in Tavor.

As can be seen, none of the necessary components of Applicants' method -- user text snippets, user profiles, personalized recommendations based on user requirements and preferences from user profiles, or dynamically generated fluent text that is used to convey product analyses -- are even hinted at in these paragraphs (or anywhere else in Tavor).

The Examiner also stated "Tavor does not teach 'user profile text snippets produces personalized recommendation for the product featuring dynamically generated fluent text ... analysis and recommendation tailored to the user requirements and preferences.'" Applicants respectfully agree with this statement by the Examiner.

The Examiner further stated "Dicker et al. teaches 'user profile text snippets produces personalized recommendation for the product featuring dynamically generated fluent text ... analysis and recommendation tailored to the user requirements and preferences.' (see page 6, paragraphs [0071] -- [0076])". The Applicants respectfully disagree. The Dicker reference discloses a completely different method of recommending products to users as is further explained below.

Dicker et al. teaches providing a recommendation to the user when the user has already added an item to his shopping cart, i.e. recommends additional items to the user after the user has already made his choice. The Applicants' method explains to the user why certain products are recommended to him before he makes a choice. Secondly, in the cited Paragraphs [0071] -- [0076] and elsewhere in the reference, Dicker et al. recommends additional items to the user (1) based on similarity with the product(s) that the user has chosen during the current session; (2) based on the user's prior purchase

history. Dicker et al. method defines "user profile" essentially as "user's prior purchase history". In Paragraph [0073], Dicker et al. identifies "items of known interest" based on items purchased, viewed, or in the shopping cart. In addition, the history of visited web sites, "favorite places" bookmarks list, or credit card records of prior purchases are used to identify "items of known interest". To the contrary, the present invention explains to the user, before he has chosen any item, how the recommended items relate to his preferences in terms of product features stated during the current session. No prior history of purchases is used. This shows that the meaning of "personalization" in Dicker et al. and in the method of the present invention is totally different and has no overlap. Finally, the method described by Dicker et al. presents recommended additional items in a list, which is preceded by a uniform text of the kind: "Customers who viewed this item, also viewed these items:...", see Figures 6, 11, 12, 14, and 15 in Dicker et al. No recommendation explanation text is composed automatically and no dynamically generated fluent text can be produced by the method of Dicker et al. No text snippets for the user's profile are prepared or used. On the contrary, the essence of the Applicants' invention is to automatically produce fluent text recommendations, where personalization is achieved by using user profile text snippets, the recommendations being based on the user preferences stated in the current session.

As can be seen, the necessary components of Applicants' method cited by the Examiner, including "user profile text snippets produces personalized recommendation for the product featuring dynamically generated fluent text ... analysis and recommendation tailored to the user requirements and preferences", are not present in Dicker et al.

Therefore, as Applicants have demonstrated, the Tavor and Dicker et al. references either alone or in combination do not contain the necessary components of the present invention. Accordingly, those skilled in the art would not be able to combine these references to develop the method of the present invention.

Therefore, it is respectfully suggested that the rejection of claims 1, 3, 5 through 11, 13, and 14 under 35 USC 103 (a) as being unpatentable over Tavor in view of Dicker et al. is overcome.

The Examiner also stated that "As per claim 5, this claim is rejected on grounds corresponding to the arguments given above for rejected claim 1 and is similarly rejected

including the following: - Tavor teaches 'testing the user profile text snippets' (see page 5, paragraphs [0057] - [0059])." Again, there is nothing in these paragraphs which mentions user profile text snippets at all, nor is there anything about testing them. This claim should be allowable for the same reasons as Claim 1 on which it depends, plus the additional limitation it contains.

The Examiner further stated, "As per claim 6, this claim is rejected on grounds corresponding to the arguments given above for rejected claim 1 and is similarly rejected including the following: - Tavor teaches 'providing access to the product recommendation ...' (see page 4, paragraphs [0058] - [0059])." This is correct, but the current Applicants' claims do not involve providing access to product comparisons, only to personalized recommendations as claimed in Claim 1 on which Claim 6 depends. This claim should also be allowable for the same reasons as Claim 1 on which it depends, plus the additional limitation it contains.

The Examiner also stated, "As per claim 7, this claim is rejected on grounds corresponding to the arguments given above for rejected claim 1 and is similarly rejected including the following: - Tavor teaches 'a computer network...' (see abstract)." Tavor does teach a computer network, but that is only the first part of claim 7. The entire claim should be considered in the comparison to Tavor, and Tavor does not teach "providing customers with product recommendations over a computer network, by combining the generic phrases with feature text snippets and user profile text snippets to produce personalized recommendations for the products featuring dynamically generated fluent text that conveys product analyses and recommendations tailored to the user requirements and preferences." Claim 7 should be allowable for the same reasons as Claim 1 on which it depends, plus the additional limitation it contains.

The Examiner further stated, "As per claims 8-12, these claims are rejected on grounds corresponding to arguments given above for rejected claims 1-7 and are similarly rejected including the following: - Tavor teaches 'display and explanation of a comparison between several products' (see page 4, paragraphs [0050] - [0051])." Applicants respectfully disagree. For the reasons cited above, Claims 8, 9, 10, and 11 are allowable over Tavor in view of Dicker et al. The Applicants' method and claims does not claim comparison between several products, Claims 8, 9, 10, and 11 claim providing personalized natural language product recommendations. Claim 12 is not in the case.

Finally, the independent Claims 1 and 8 in the present application clearly provide for the method of the invention to prepare a personalized recommendation of a product featuring dynamically generated fluent text that is used to convey a product analysis and recommendation tailored to the user requirements and preferences by the combination of generic phrases, feature text snippets, and user text snippets, where said recommendation is not based on the user's purchase history. Neither the Tavor reference, nor the Dicker et al. reference, nor the combination of these two references, shows or suggests the features of the Applicants' method. Therefore, it is respectfully suggested that the rejection of independent Claims 1 and 8 under 35 USC 103 (a) as being unpatentable over Tavor in view of Dicker et al. is overcome. Dependent Claims 3, 5-7, 9-11, and 13-14, being dependent upon and further limiting independent Claims 1 and 8, should also be allowable for the same reasons, as well as for additional limitations they contain. Reconsideration and withdrawal of the rejection are respectfully requested.

Conclusion

The Applicants believe that the claims are patentable over the prior art, and that this case is in condition for allowance of all claims therein. Such action is thus respectfully requested.

Respectfully submitted:

David Caldwell, Michael White, and Tanya Korelsky

By:  7/25/2004

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